

JULY 7, 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	NO. 08 CR 398
Plaintiff,)	Hon. Marvin C. Ashman,
)	Judge Presiding
vs.)	
)	
DUMITRU CURESCU,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR PERMISSION TO TRAVEL TO
CRIVITZ, WISCONSIN FOR A CAMPING TRIP**

The Defendant, DUMITRU CURESCU, by his attorney, Leonard C. Goodman, respectfully requests that this Honorable Court enter an order modifying the conditions of his pre-trial release to permit travel to Wisconsin for a camping trip. In support thereof, the following is offered:

1. The defendant, Dumitru Curescu was released on bond secured by his property on May 22, 2008.
2. Dumitru Curescu desires to travel to Crivitz Wisconsin for a camping trip from July 10 through July 13.
3. Mr. Curescu has agreed to provide Pretrial Services Officer Reyes with specific dates of travel and contact information. He will be reachable at all times during his trip on his cell phone.
4. The government and Pretrial Services have indicated that they do not object to this request.

WHEREFORE, based on the foregoing, the defendant respectfully requests permission to travel to Wisconsin after providing Pretrial Services with the itinerary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "L.C. Goodman".

Leonard C. Goodman
53 W. Jackson
Suite 1220
Chicago, Illinois 60604
(312) 986-1984